

EXHIBIT 251

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,)
)
Plaintiffs,) Case No.
) 4:20-cv-00957-SDJ
vs.)
)
GOOGLE LLC,)
)
Defendant.)
_____)

DEPOSITION OF JOHN OLSON,
30(b)(6) DESIGNEE FOR THE STATE OF IDAHO
May 3, 2024

Reported by:
Rebecca Martin, CSR #1108, RPR, CRR
Job No. CS6657429

DEPOSITION OF JOHN OLSON

BE IT REMEMBERED that the deposition of JOHN OLSON was taken via videoconference by the Defendant before Veritext Legal Solutions, Rebecca Martin, Court Reporter and Notary Public in and for the County of Ada, State of Idaho, on Friday, the 3rd day of May, 2024, commencing at the hour of 11:10 a.m. in the above-entitled matter.

APPEARANCES:

For the Defendant:

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1 Appearances (Cont.)

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6 Also Present: Vladimir Korneychuk, videographer

7 Chelsea Gilchrist, concierge

 Lynn Mize

1 been harm to the general welfare and the economy of
2 the state of Idaho, correct, based on Google's
3 conduct?

4 A. Yes.

5 Q. What is Idaho's understanding of the
6 harm to the general welfare of the economy or the
7 state of Idaho?

8 MS. SCHULTZ: Object to form.

9 THE WITNESS: As to that, I'll defer, again,
10 to the testimony by the Texas witness as the harm
11 to Idaho's general welfare and economy is of the
12 same nature as supported and described by the
13 common set of facts that is in the Fourth Amended
14 Complaint and our interrogatory responses and other
15 discovery.

16 Q. (BY MS. CURRAN) So as you sit here
17 today, the State of Idaho does not have any
18 evidence regarding the proportion and magnitude of
19 Idaho's state economy and Idaho's population
20 affected by Google's alleged conduct, right?

21 MS. SCHULTZ: Object to form.

22 THE WITNESS: Correct. That type of
23 evidence will be -- may come through the discovery
24 that's going on now as well as be identified
25 through expert reports and discovery.

1 Q. (BY MS. CURRAN) And the State of Idaho
2 doesn't have any evidence, as you sit here today,
3 about the population of the citizens of the state
4 of Idaho affected by Google's alleged conduct,
5 correct?

6 MS. SCHULTZ: Object to form.

7 THE WITNESS: I'm aware that there are just
8 shy of 2 million people in the state of Idaho, and
9 because of the ubiquitous nature of the use of
10 Internet and Internet advertising, a large portion
11 of that group -- of the people in Idaho as well as
12 publishers and advertisers both suffered the harm.
13 Beyond that, I can't identify any unique
14 or separate specific evidence of the alleged harm
15 in Idaho.

16 Q. (BY MS. CURRAN) But to be clear:
17 Sitting here today, the State of Idaho does not
18 have any specific evidence about the population of
19 the citizens of the state affected by Google's
20 alleged conduct, right?

21 MS. SCHULTZ: Object to form.

22 THE WITNESS: Yes. Although that, again, a
23 finer point may be put to that through expert
24 reports and discovery.

25 MS. SCHULTZ: Counsel, at some point when

1 you reach a natural breaking point, do you want to
2 go ahead and take a break?

3 MS. CURRAN: Sure. That could be right now.
4 I'm actually about to move to something new, so a
5 break now sounds great.

6 THE VIDEOGRAPHER: Okay. Off the record at
7 12:48 p.m.

8 (A recess was taken from 12:48 p.m. to 1:28 p.m.)

9 THE VIDEOGRAPHER: Back on the record at
10 1:28 p.m.

11 MS. CURRAN: Thank you. Sorry for
12 interrupting.

13 Q. (BY MS. CURRAN) Mr. Olson, we are back
14 on the record after a short lunch break.

15 Do you understand that you're still
16 under oath?

17 A. Yes.

18 Q. Did you have any discussions with your
19 counsel during the break?

20 A. Yes.

21 Q. Did you discuss the substance of your
22 testimony?

23 A. No.

24 MS. CURRAN: Can we put up Tab 7?

25 THE CONCIERGE: One moment, please.

REPORTER'S CERTIFICATE

STATE OF IDAHO)
) ss.
COUNTY OF ADA)

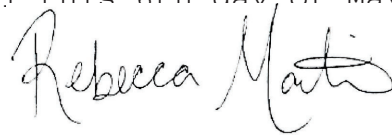
I, REBECCA MARTIN, Certified Shorthand Reporter and Notary Public in and for the State of Idaho, do hereby certify:

That prior to being examined, the witness named in the foregoing deposition was duly sworn remotely by me to testify to the truth, the whole truth and nothing but the truth;

That said deposition was taken down by me in shorthand at the time and place therein named and thereafter reduced to typewriting under my direction, and that the foregoing transcript contains a full, true and verbatim record of said deposition.

I further certify that I have no interest in the event of the action.

WITNESS my hand and seal this 6th day of May 2024



REBECCA MARTIN
RPR and Notary
Public in and for the
State of Idaho

My Commission Expires: 08-27-2024